

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
STATESBORO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEVIN TYRONE SAUNDERS,

Defendant.

) **CITATION OF NEW AUTHORITY FOR**
) **MOTION FOR RECONSIDERATION OF**
) **MOTION FOR COMPASSIONATE**
) **RELEASE/REDUCTION IN SENTENCE**
) **PURSUANT TO 18 U.S.C. § 3582(C)(1)(A)**
) **AND THE FIRST STEP ACT OF 2018**

) **CASE NO. 6:09-cr-00042-LGW-CLR-1**
)
)
)

COMES Movant, KEVIN TYRONE SAUNDERS (“Saunders”), appearing *pro se*, and files his Citation of New Authority for Motion for Reconsideration of Motion for Compassionate Release/Reduction in Sentence Pursuant to 18 U.S.C. § 3582(C)(1)(A) and the First Step Act of 2018, and would show as follows:

I. PRELIMINARY STATEMENT

As a preliminary matter, Saunders respectfully requests that the Court be mindful that “a *pro se* complaint should be given liberal construction, we mean that if the essence of an allegation is discernible ... then the district court should construe the complaint in a way that permits the layperson’s claim to be considered within the proper legal framework.” See *Campbell v. Air Jamaica Ltd.*, 760 F.3d 1165 (11th Cir. 2014) (“*Pro se* pleadings are held to a less stringent standard than pleadings drafted by attorneys and will, therefore, be liberally construed.”); *Estelle v. Gamble*, 429 U.S. 97 (1976) (same); and *Haines v. Kerner*, 404 U.S. 519 (1972) (same).

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
STATESBORO DIV.
SEP 26 2022
A 11:21
CLERK
SOUTHERN DISTRICT OF GEORGIA

II. CITATION OF NEW AUTHORITY

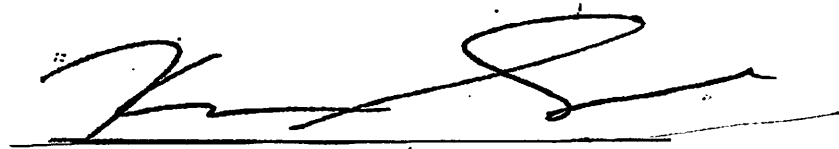
Since the filing of his Motion for Reconsideration of Motion for Compassionate Release/Reduction in Sentence Pursuant to 18 U.S.C. § 3582(C)(1)(A) and the First Step Act of 2018, Saunders has received a letter from the Illinois Cancer Care dated September 6, 2022. In this letter, Kimberly Ku, M.D., explains the current state of Sandra Saunders and her cancer treatments. See **Exhibit-I**, attached hereto. She states that Ms Saunders cancer has relapsed metastatic adenocarcinoma of the colon. She initially was diagnosed with stage III disease in September 2021; however, she subsequently had a relapse in the right inguinal lymph node.

Saunders files this Citation of New Authority to further support and evidence of the fact that Ms. Saunders needs her husband home to take care of her in her current condition.

WHEREFORE, premises considered, Saunders prays that the Court will consider this new evidence of his wife's condition, and grant him compassionate release due to his wife's underlying incurable cancer.

Respectfully submitted,

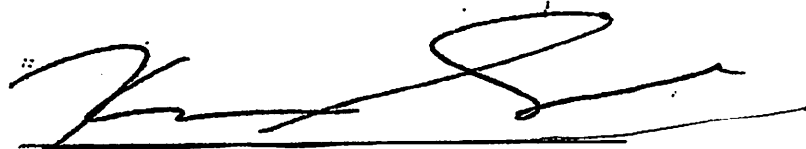
Dated: September 23, 2022



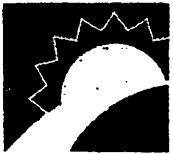
KEVIN TYRONE SAUNDERS
REG. NO. 14085-021
FCI BUTNER MEDIUM II
FEDERAL CORR. INSTITUTION
P.O. BOX 1500
BUTNER, NC 27509

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2022, a true and correct copy of the above and foregoing Citation of New Authority for Motion for Reconsideration of Motion for Compassionate Release/Reduction in Sentence Pursuant to 18 U.S.C. § 3582(c)(1)(A) and the First Step Act of 2018 was sent via U. S. Mail, postage prepaid, Justin G. Davids, at U.S. Attorney's Office, Southern District of Georgia, 22 Barnard St., Savannah, GA 31401.

A handwritten signature in black ink, appearing to read 'Kevin Tyrone Saunders', written over a horizontal line.

KEVIN TYRONE SAUNDERS



**ILLINOIS
CANCERCARE, P.C.**

Specializing in Cancer and Blood Disorders

September 6th, 2022

RE: SAUNDERS, SANDRA LEE, DOB: 6/30/1970

To Whom It May Concern:

Sandra Saunders is being cared for at Illinois CancerCare for relapsed metastatic adenocarcinoma of the colon. She initially was diagnosed with stage III disease in September 2021; however, she subsequently had a relapse in the right inguinal lymph node and underwent a biopsy that proved metastatic disease. She has been undergoing chemotherapy and at this time is stable. She, however, does have problems with decrease in her blood counts from her treatment which may limit future treatment options. Her long term prognosis is uncertain and dependent on how well she handles chemotherapy and response to treatments. Currently her husband is in federal prison and due to her incurable diagnosis of colon cancer, uncertain prognosis, she is hoping for an earlier release in order for him to spend more time with her given her shortened life expectancy. Her daughter lives nearby, but is a single mother working full time. She does not have consistent moral support. She would benefit from having help with transportation and caring for her 13 year old son while going through chemotherapy. Typically the median life expectancy for metastatic colon cancer is approximately two years but this can be shorter or longer depending on response and available therapies. She does also have other comorbidities that can shorten her life expectancy and based on her diagnosis and comorbidities she would be expected to have a life expectancy of less than one year. If I can be of any further assistance, please do not hesitate to contact me at Illinois CancerCare, (309) 243-3000. Thank you in advance for consideration of early release of her husband due to her underlying incurable cancer.

Sincerely,

Kimberly Ku, MD

PHYSICIANS

Fahad B. Asad, MD
Madhuri Bajaj, MD
Vijay K. Damarla, MD
Paul A.S. Fishkin, MD
Francols J. Geoffroy, MD
Gregory J. Gerstner, MD
Musaberk Goksel, MD
Patrick L. Gomez, MD
Srinivas Jujavarapu, MD
Kimberly Ku, MD
Pankaj Kumar, MD
Nguyet A. Le-Lindqwister, MD
Jane Liu, MD
Gary R. MacVicar, MD
Nadia Q. Rehman, MD
Shawn M. Seibert, MD
Michael H. Veeder, MD
Shijia Zhang, MD

ADVANCED

PRACTICE NURSES

Debra E. Beach, APN
Elizabeth M. Berryman, APN
Rachel E. Blodgett, APN
Karl A. Breckenridge, APN
Jamie C. Cook, APN
Tammy S. Dally, APN
Melissa S. DeLa Torre, APN
Holly Jo Delinski, APN
Kami L. Doubet, APN
Jodi E. Foreman, APN
Jessica Gamblin, APN
Lindsey L. Grys, APN
Michelle D. Johnson, APN
Kathie A. Kindred, APN
Jessica N. Lemmerman, APN
Sarah L. Lindsey, APN
Doreen L. Link, APN
Jennifer M. Mendaluk, APN
Roxanne R. McLaughlin, APN
Heather R. Pierce, APN
Nita Raut, APN
Gloria J. Riley, APN
Gina D. Riner, APN
Deborah J. Rufus, APN
Cynthia Salazar, APN
Robin L. Schertz, APN
Kim M. Scott, APN
Jessica M. Stewart, APN
Erin L. Whalen, APN
Judy Williamson, APN

EXHIBIT-1

QCP

QOPI Certification Program

KEVIN TYRONE SAUNDERS
REG. NO. 14085-021
FCI BUTNER MEDIUM II
FEDERAL CORR. INSTITUTION
P.O. BOX 1500
BUTNER, NC 27509

September 23, 2022

Mr. John E. Triplett
Clerk of Court
U.S. District Court
Southern District of Georgia
Statesboro Division
P.O. Box 8286
Savannah, GA 31412

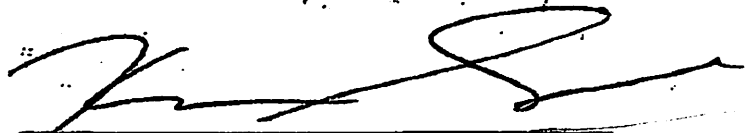
RE: *Saunders v. United States*
Crim No. 6:09-cr-00042-LGW-CLR-1

Dear Mr. Triplett:

Enclosed please find and accept for filing Movant's Citation of New Authority for Motion for Reconsideration for Motion for Compassionate Release/Reduction in Sentence Pursuant to 18 U.S.C. § 3582(c)(1)(A) and the First Step Act of 2018. Please submit this document to the Court.

Thank you for your assistance in this matter.

Sincerely,



KEVIN TYRONE SAUNDERS
Appearing *Pro Se*

Encl. as noted

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FROM:

KEVIN TYRONE SAUNDERS
REG. NO. 14085-021
FCI BUTNER MEDIUM II
FEDERAL CORR. INSTITUTION
P.O. BOX 1500
BUTNER, NC 27509

TO:

Mr. John E. Triplett, Clerk of Court
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Southern District of Georgia
Statesboro Division
P.O. Box 8286
Savannah, GA 31412

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